

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants.

Civil Action No. 3:14-cv-00852-REP-
GBL-BMK

JOINT MOTION TO ALLOW FILING OF AMENDED COMPLAINT

Plaintiffs, Defendants, and Intervenor-Defendants (collectively, the “Parties”) jointly request that this Court permit Plaintiffs to file an Amended Complaint in the above-captioned matter.

The Parties respectfully submit that there is good cause to grant this motion. Plaintiffs filed the Complaint in this matter on December 22, 2014. The Complaint identified Terrell Kingwood as a Plaintiff residing in District 90. Plaintiffs have determined the need to replace Plaintiff Terrell Kingwood with Plaintiff Thomas Calhoun because Plaintiff Terrell Kingwood has changed his place of residence. Plaintiff Thomas Calhoun, a resident of District 90, is a United States citizen and registered voter in the Commonwealth of Virginia.

With the exception of the substitution of Plaintiff Thomas Calhoun, the proposed Amended Complaint does not differ from the original Complaint. *See* Ex. A.

For the foregoing reasons, the Parties respectfully request that this Court permit Plaintiffs to file an Amended Complaint in the above-captioned matter.

Pursuant to this Court's ECF Policies and Procedures, a consent order reflecting this proposed modification will be filed with the clerk's office.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of June 2015, I caused the foregoing to be electronically filed with the Clerk of this Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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